



Competency 4.9 Industrial hygiene personnel shall demonstrate the ability to independently assess contractor and/or Department of Energy compliance with the industrial hygiene-related requirements contained in the following Orders with respect to occupational health protection issues:

- DOE Order 3790.1B, Federal Employee Occupational Safety and Health Program
- DOE Order 5480.4, Environmental Protection, Safety, and Health Protection Standards
- DOE Order 5480.10, Contractor Industrial Hygiene Program
- DOE Order 5482.1B, Environment, Safety, and Health Appraisal Program

1. Supporting Knowledge and Skills

- a. Assess contractor and/or Department work activities in accordance with relevant programmatic responsibilities and requirements of the above Orders.
- b. Given data from an industrial hygiene assessment, analyze results to determine compliance with applicable requirements of the above Orders.
- c. Given the findings from an assessment of compliance or non-compliance, document the results and communicate results to the contractor and/or Department line management.

2. Recommended Reading

Review

- DOE Order 3790.1B, *Federal Employee Occupational Safety and Health Program*.
- DOE Order 5480.4, *Environmental Protection, Safety, and Health Protection Standards*.
- DOE Order 5480.10, *Contractor Industrial Hygiene Program*.
- DOE Order 5482.1B, *Environment, Safety, and Health Appraisal Program*.
- DOE Order 440.1, *Worker Protection Management for DOE Federal and Contractor Employees*.



3. Summary

DOE industrial hygienists may be called upon to formally assess the adequacy of a contractor's industrial hygiene program.

Performing an assessment begins with determining what aspects of the program one will assess and for how long. This preparation will usually require a review of the regulations with which the industrial hygienist intends to assess compliance, and may require the preparation of a checklist to summarize the subjects being assessed and a plan of how the information will be gathered.

The best assessments will require the interview with knowledgeable contractor personnel, workplace observations, and the review of related program documentation. Ensuring that the right operations are viewed, personnel met, and documents found requires significant knowledge of the organization being assessed, as well as its personnel and operations.

Interviews with contractor subject matter experts will probably be the most productive. Their apparent technical knowledge and demonstrations of management philosophy will probably provide the careful observer with a realistic preview of the program to be assessed. These individuals will also be able to provide access to other aspects of the program such as current operations of interest and the program documentation to be viewed.

Field observation is desirable, but it may not always be possible to find operations of interest. Even if performed regularly, they may be extremely intermittent and of short duration. Depending on the purpose of the assessment, the operations may be evaluated either from the point of view of strict compliance with all rules and procedures (compliance based), or from the point of view of the real likelihood of the conditions observed leading to unnecessary exposure or illness, or a combination of both. In either case, the assessor may need a checklist to ensure that relevant observations are made and documented to support judgments made about practices in the field that are sometimes based upon slim data available at the time.

Because there are concerns about the long-term effects of many industrial hygiene exposures, documentation is a critical component of the program. Records of potential relevance to any program include sitewide and technical industrial hygiene procedures; past exposure assessments and reports; air sampling of related operations; status of workplace controls, employee training records, and training plans; and employee medical qualification and medical surveillance documentation.

In general, good documentation indicates that other aspects of the program may also be adequate. Poor documentation demonstrates the contractor's inability to answer future questions about past industrial hygiene activities, and may indicate lack of follow-through elsewhere.

The assessment must be documented in a formal report that is to be communicated to the



contractor. The exact format of the report should be determined by the purpose of the assessment and the audience for which it is targeted. It must also be consistent with any local prescribed format. At a minimum, the report should contain the dates during which it was performed, who performed it, and the methods used; the criteria evaluated; observations made; deficiencies and recommendations; and data charted if any were gathered. The report normally is submitted in draft to the contractor to verify factual accuracy before the report is made final and formally transmitted.

The method of follow-up to be performed will also depend on local requirements, but, at a minimum, the contractor should be required to accept or reject the findings and recommendations and submit a plan of action to remedy those findings it accepts. DOE should verify that the contractor has completed promised actions, and the more important findings should be monitored long after corrective actions have apparently been completed to verify future contractor attention.

It should be emphasized that, in performing assessments, the industrial hygienist is essentially a consultant to the DOE Area, Field, or Operations Office Manager and Contracting Officer. In this capacity, the industrial hygienist does not direct, but rather evaluates and recommends to the contractor through DOE management. In this way, if the ultimate contractor response requires a change in the scope or cost of work, it may be negotiated or directed by the legally responsible DOE management or contracting personnel. DOE or even the DOE industrial hygienist personally may be liable for contractor costs incurred through the industrial hygienist's orders if they are not directed through responsible DOE management or contracting personnel.

4. Suggested Exercises

There are currently no scenarios that support this competency.